# IN THE UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04 – 40253 - FDS

DAVID BREMNER, Individually and as Father	)
and Next Friend of MOLLY BREMNER, and	)
VICKI BAKER	)
Plaintiffs	)
	)
VS.	)
	)
A.B. CHANCE COMPANY and HUBBELL	)
INCORPORATED	)
Defendants	)

## JOINT STATEMENT FILED PURSUANT TO F.R.C.P. 26(F) AND LOCAL RULE 16.1

The plaintiffs, David Bremner and Vicki Bremner, and the defendants, A.B. Chance Company and Hubbell Incorporated, hereby submit the following Joint Statement pursuant to F.R.C.P. 26(f) and Local Rule 16.1.

#### 1. <u>Initial Disclosures</u>

Initial Disclosures by August 30, 2005

# 2. <u>Amendments to Pleadings</u>

Except for Good Cause, by September 30, 2006

## 3. <u>Fact Discovery Interim Deadlines Plan</u>

Req. for Prod. & Ints. by July 30, 2006

Req. for Admissions by July 30, 2006

Fact Depositions by September 30, 2006

4.	Fact Discovery	y Deadline

Fact Discovery Completed by September 30, 2006

5. Status Conference

> Conference to be held by September 30, 2006'

6. **Expert Discovery** 

> Plaintiffs' Expert Disclosures by November 30, 2006

> Defendants' Expert Disclosures by December 31, 2006

Expert Depositions Completed by April 30, 2007

7. **Dispositive Motions** 

> Motions to be filed by July 31, 2007

September 30, 2007 Oppositions filed by

8. **Pretrial Conference** 

> Held by September 30, 2007

> > Respectfully Submitted,

Attorney for the Plaintiffs,

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